UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS MIDLAND-ODESSA DIVISION

| MARK A. BURKETT | § | |
|------------------------------------|---|---------------------|
| | § | |
| Plaintiff, | § | |
| | § | |
| v. | § | |
| | § | |
| THE AZTEC WELL FAMILY, | § | |
| AZTEC WELL SERVICING CO., | § | Case No. 7:20-cv-52 |
| AZTEC DRILLING, | § | JURY DEMANDED |
| TRIPLE S TRUCKING CO., INC., | § | |
| TOTAH RENTAL & EQUIPMENT CO., | § | |
| DOUBLE M SALES & FILTER SERVICES, | § | |
| ROADRUNNER FUELS and JASON SANDEL, | § | |
| | § | |
| Defendants. | § | |
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PLAINTIFF'S ORIGINAL COMPLAINT

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Plaintiff Mark A. Burkett ("Burkett") files his original complaint and for causes of action says:

I. <u>PARTIES</u>

- 1. Burkett is an individual citizen and resident of Midland County, Texas.
- 2. On information and belief, Aztec Family is an unincorporated business association comprised of numerous entities and individuals, all of which are citizens of New Mexico but engage in Aztec Family's business in Texas.
- 3. According to records of the Texas Secretary of State and the New Mexico Secretary of State, the members of Aztec Family are believed to include, but may not be limited to, the following entities, business associations and persons:
 - (a) Aztec Well Servicing Co., a New Mexico corporation, authorized to do business in Texas with an office at 5023 Princeton Avenue #2, Midland, TX 79703

- (b) Aztec Drilling, believed to be an unincorporated business association, not authorized to do business in Texas
- (c) Triple S Trucking Co., Inc., d/b/a Triple S. Trucking Co. is a New Mexico corporation and wholly owned subsidiary of Aztec Well, authorized to do business in Texas with offices at 5023 Princeton Avenue #2, Midland, TX 79703 and 1750 W. Highway 85, Dilley TX 78017
- (d) Totah Rental & Equipment Co., a New Mexico corporation not authorized to do business in Texas
- (e) Double M Sales & Filter Services, believed to be an unincorporated business association, not authorized to do business in Texas
- (f) Roadrunner Fuels, believed to be an unincorporated business association, not authorized to do business in Texas
- (g) Jason Sandel, an individual citizen and resident of New Mexico
- 4. Aztec Family does not maintain a regular place of business in this state or a designated agent for service of process in any proceeding that arises out of the business it has done in this state and to which Aztec Family is a party. Pursuant to *Tex. Civ. Prac. & Rem. Code* §§ 17.044 and 17.045, Aztec Family may be served with process in this case by serving duplicate copies of process and this original complaint upon the Secretary of State of Texas as Aztec Family's statutory agent for service of process. Upon receipt, the Secretary of State of Texas shall immediately mail a copy of the process to Aztec Family at its home office, which is believed to be located at 300 Legion Road, P.O. Box 100, Aztec, New Mexico 87410.
- 5. Aztec Well Servicing Co. ("Aztec Well") is a New Mexico corporation authorized to do business in Texas and doing business in Texas at all times pertinent to this case. Aztec Well may be served with summons by serving its registered agent for acceptance of service of summons, CT Corporation System, at 1999 Bryan Street, Suite 900, Dallas, TX 75201-3136.

- 6. Aztec Drilling ("Drilling") is believed to be an unincorporated business association, not authorized to do business in Texas but doing business in Texas at all times pertinent to this case. Drilling does not maintain a regular place of business in this state or a designated agent for service of process in any proceeding that arises out of the business it has done in this state and to which Drilling is a party. Pursuant to *Tex. Civ. Prac. & Rem. Code* §§ 17.044 and 17.045, Drilling may be served with process in this case by serving duplicate copies of process and this original complaint upon the Secretary of State of Texas as Drilling's statutory agent for service of process. Upon receipt, the Secretary of State of Texas shall immediately mail a copy of the process to Drilling at its home office, which is believed to be located at 300 Legion Road, P.O. Box 100, Aztec, New Mexico 87410.
- 7. Triple S Trucking Co., Inc., d/b/a Triple S. Trucking Co. ("Triple S") is a New Mexico corporation authorized to do business in Texas and doing business in Texas at all times pertinent to this case. Triple S may be served with summons by serving its registered agent for acceptance of service of summons, CT Corporation System, at 1999 Bryan Street, Suite 900, Dallas, TX 75201-3136.
- 8. Totah Rental & Equipment Co. ("Totah") is a New Mexico corporation not authorized to do business in Texas but believed to be doing business in Texas at all times pertinent to this case. Totah does not maintain a regular place of business in this state or a designated agent for service of process in any proceeding that arises out of the business it has done in this state and to which Totah is a party. Pursuant to *Tex. Civ. Prac. & Rem. Code* §§ 17.044 and 17.045, Totah may be served with process in this case by serving duplicate copies of process and this original complaint upon the Secretary of State of

Texas as Totah's statutory agent for service of process. Upon receipt, the Secretary of State of Texas shall immediately mail a copy of the process to Totah at its home office, which is believed to be located at 812 S. Main Avenue, P.O. Box 478, Aztec, New Mexico 87410.

- 9. Double M Sales & Filter Services ("Double M") is believed to be an unincorporated business association, not authorized to do business in Texas but doing business in Texas at all times pertinent to this case. Double M does not maintain a regular place of business in this state or a designated agent for service of process in any proceeding that arises out of the business it has done in this state and to which Double M is a party. Pursuant to *Tex. Civ. Prac. & Rem. Code* §§ 17.044 and 17.045, Double M may be served with process in this case by serving duplicate copies of process and this original complaint upon the Secretary of State of Texas as Double M's statutory agent for service of process. Upon receipt, the Secretary of State of Texas shall immediately mail a copy of the process to Double M at its home office, which is believed to be located at 1711 San Juan Boulevard, Farmington, New Mexico 87401.
- 10. Roadrunner Fuels ("Roadrunner") is believed to be an unincorporated business association, not authorized to do business in Texas but doing business in Texas at all times pertinent to this case. Roadrunner does not maintain a regular place of business in this state or a designated agent for service of process in any proceeding that arises out of the business it has done in this state and to which Roadrunner is a party. Pursuant to *Tex*. *Civ. Prac. & Rem. Code* §§ 17.044 and 17.045, Roadrunner may be served with process in this case by serving duplicate copies of process and this original complaint upon the Secretary of State of Texas as Roadrunner's statutory agent for service of process. Upon

receipt, the Secretary of State of Texas shall immediately mail a copy of the process to Roadrunner at its home office, which is believed to be located at 800 South Main Avenue, Aztec, New Mexico 87410.

- 11. Jason Sandel ("Sandel") is an individual citizen and resident of New Mexico who does not maintain a regular place of business in this state or a designated agent for service of process in any proceeding that arises out of the business he has done in this state and to which Sandel is a party. Pursuant to *Tex. Civ. Prac. & Rem. Code* §§ 17.044 and 17.045, Sandel may be served with process in this case by serving duplicate copies of process and this original complaint upon the Secretary of State of Texas as Jason Sandel's statutory agent for service of process. Upon receipt, the Secretary of State of Texas shall immediately mail a copy of the process to Sandel at his principal place of business and home office, which is believed to be located at 300 Legion Road, P.O. Box 100, Aztec, New Mexico 87410.
- 12. As members of Aztec Family, each of Aztec Well, Drilling, Triple S, Totah, Double M and Roadrunner are individually, jointly and severally liable for the conduct of Aztec Family and all damages resulting therefrom. Sandel, an officer or agent of Aztec Family and each of its members, directed the activities of Aztec Family and its members and is also jointly and severally liable for the conduct of Aztec Family and all damages resulting therefrom, as a material participant in such activities.
- 13. Aztec Family has operated its activities in the State of Texas as a joint enterprise and/or as a partnership. Such activities, which are more fully set forth below, were directed by Sandel as a joint enterprise under an express or implied agreement of Aztec Family members who operated under a common purpose and had a community of

pecuniary interests to facilitate and promote the oil and gas service business of Aztec Family members.

14. Aztec Family also operated its activities as a partnership of Aztec Family members in the State of Texas, and Aztec Family members had a right to participate in the control of the business and activities conducted by Aztec Family and contributed, or agreed to contribute, money or property to fund the business and activities of Aztec Family.

II. <u>JURISDICTIONAND VENUE</u>

- 15. Jurisdiction is proper in this Court based on diversity of citizenship pursuant to 28 U.S.C. § 1332 (a)(l) and (2), because Burkett is a citizen of Texas, each member of Aztec Family is a citizen of New Mexico and the matter in controversy exceeds \$75,000, exclusive of interest and costs.
- 16. Venue is proper in this District pursuant to 28 U.S.C. §1391(a), because Aztec Family and each of its members are subject to personal jurisdiction in this District and the dispute giving rise to this litigation concerns conduct committed by Aztec Family in Midland County, Texas.

III. FACTUAL BACKGROUND

A. <u>The persons involved</u>

17. According to its family brochure¹, Aztec Family and each of its members are generally in the business of oil and natural gas drilling, well servicing, trucking, rentals and equipment, supplies and support services. Sandel is its executive vice president.

A true copy of Aztec Family's brochure, obtained on February 18, 2020 from http://www.aztecwell.com/pdfs/aztecwell-brochure.pdf, is attached hereto as Exhibit 1.

- 18. Burkett is a registered professional petroleum engineer, licensed to engage in petroleum engineering in Texas. He grew up in the Cross Plains, Texas area, which is approximately 50 miles southeast of Abilene, Texas. Burkett is a long-time resident of Midland, Texas and enjoys a pristine professional and personal reputation in both of his communities.
- 19. In his capacity as a registered professional petroleum engineer, Burkett has performed professional services for various entities engaged in oil and gas well operations. An oil and gas well operator named Copper Ridge Resources, LLC ("Copper Ridge"), is one of the entities for which Burkett has done so.

B. The transactions

- 20. On or about January 16, 2019, Copper Ridge signed a drilling contract with Aztec Well, which is one of the members of Aztec Family. Under the contract, Aztec Well was obligated to provide various drilling and well service activities for Copper Ridge on three (3) wells:
 - (a) Maria 1X well in Gaines County, Texas
 - (b) Warren 1 well in Lea County, New Mexico
 - (c) L.L. Butler 3 well in Gaines County, Texas
- 21. Copper Ridge paid Aztec Well in full for the amounts it billed to Copper Ridge on the Maria 1X well. However, due to substantial disputes about the quality and extent of services performed by Aztec Well on the Warren 1 well and Butler 3 well, Copper Ridge has not yet paid Aztec Well for the amounts billed to Copper Ridge on either of them.

22. After problems arose with the quality and quantity of Aztec Well's services on the Warren 1 well and L.L. Butler 3 well which Aztec Well would not rectify, Copper Ridge released Aztec Well from further activities on the L. L. Butler 3 well.

C. Disparagements of Copper Ridge

- 23. In response to Aztec Well being released, on information and belief beginning in early May, 2019, Aztec Family and its members started an intense defamation campaign directed against Copper Ridge. By way of example and without limitation:
 - (a) On or about May 17, 2019, Aztec Well's executive vice president and governing person Sandel called Jay Norton, the owner of Norton Drilling, a subsequent drilling contractor hired by Copper Ridge. On behalf of Aztec Family, Sandel told Mr. Norton that Copper Ridge was not paying its bills, even though Copper Ridge had recently paid Aztec Well \$490,000 for its work on the Maria 1X. After Sandel's phone call, Mr. Norton caused Norton Drilling to renege on its own drilling contract with Copper Ridge, resulting in Norton Drilling refusing to move its rig to Copper Ridge's designated location;
 - (b) On May 19, 2019, on behalf of Copper Ridge, Burkett sent Sandel an e-mail detailing the call from Mr. Norton and stating that Copper Ridge was aware that a representative of Aztec Well had made some disparaging comments about Copper Ridge. Burkett asked Sandel and everyone else at Aztec Well to cease making any further negative comments about Copper Ridge to any outside parties. Despite Burkett's request, Aztec Well's disparagement of Copper Ridge increased significantly;

- (c) On behalf of Aztec Family, Sandel then called RFC Drilling, another subsequent drilling contractor hired by Copper Ridge. On July 23, 2019, RFC Drilling's drilling superintendent told Copper Ridge's drilling consultant that RFC was nervous about working for Copper Ridge because Aztec Well called and said RFC would not get paid;
- (d) On August 8, 2019, a representative of Aztec Well again called RFC Drilling and disparaged Copper Ridge. RFC Drilling ultimately refused to continue working for Copper Ridge and operations were shut down on August 23, 2019 without finishing the well.
- (e) One or more representatives of Aztec Well called Pason, a drilling data company, telling Pason it would not get paid by Copper Ridge. Aztec Well tried to get Pason to turn off its system then in use by a subsequent drilling contractor hired by Copper Ridge;
- (f) Black Gold, a pit cleaning company, got a call from an Aztec Well representative, telling it that Black Gold would not get paid by Copper Ridge. To the contrary, Copper Ridge had already sent Black Gold a check on June 1, 2019, despite not even receiving an invoice from Black Gold; and
- (g) Graco Tools received a call from an Aztec Well representative stating that Graco Tools would not get paid by Copper Ridge. In response, Graco Tools demanded that Copper Ridge return its rental pipe then in use during the drilling operation of another well. Copper Ridge suspended drilling operations to change out the rental pipe to comply with Graco Tool's demands.

D. <u>Suits against Copper Ridge</u>

- 24. On October 2, 2019 Aztec Well sued Copper Ridge and others [but not Burkett] in case number in case number D-1116-CV-2019-01577 on the docket of the Eleventh Judicial District Court of San Juan County, New Mexico ("Farmington Suit"), seeking to recover \$700,200.49 from Copper Ridge for amounts allegedly owed to Aztec Well for work done on the Warren 1 well. Summons for Copper Ridge was issued that same day.
- 25. On October 24, 2019, Aztec Well served Copper Ridge with summons in the Farmington Suit by serving Copper Ridge's New Mexico registered agent, Incorp Services, Inc., at 1012 Marquez Place Ste. 106-B, Santa Fe, NM 87505.
- 26. On November 4, 2019, Aztec Well sued Copper Ridge and others [but not Burkett] in case number 19-11-18252 on the docket of the 106th District Court of Gaines County, Texas ("L. L. Butler 3 Suit"), seeking to recover \$605,525.83 from Copper Ridge for amounts allegedly owed to Aztec Well for work done on the L. L. Butler 3 well.
- 27. On November 7, 2019, Aztec Well served Copper Ridge with citation in the L. L. Butler 3 Suit by serving Copper Ridge's Texas registered agent, Legalinc Corporate Services Inc., at its registered office, 10601 Clarence Drive, Suite 250, Frisco, Collin County, Texas 75033 exactly as alleged in Paragraph 4 of Aztec Well's original petition.
- 28. On November 4, 2019, Triple S sued Copper Ridge and others [but not Burkett] in case number 19-11-18253 on the docket of the 106th District Court of Gaines County, Texas ("Triple S Suit"), seeking to recover \$65,000.00 from Copper Ridge for amounts allegedly owed to Triple S for work done on the Maria 1X well.

- 29. On November 7, 2019, Triple S served Copper Ridge with citation in the Triple S Suit by serving Copper Ridge's Texas registered agent, Legalinc Corporate Services Inc., at its registered office, 10601 Clarence Drive, Suite 250, Frisco, Collin County, Texas 75033 exactly as alleged in Paragraph 4 of Triple S's original petition.
- 30. Neither Aztec Well nor Triple S have sued Burkett individually in connection with any of the above-mentioned suits.

E. Aztec Family's disparagement of Burkett

- 31. Burkett was not Copper Ridge's registered agent for service of summons or process at any time pertinent to the claims in this case. Instead, at all pertinent times, Copper Ridge has had corporate registered agents -- Legalinc Corporate Services Inc. in Texas and Incorp Services, Inc. in New Mexico.
- 32. At all pertinent times, Aztec Family was aware of the existence, identity and addresses of Copper Ridge's registered agents. Both were specifically listed in the official records of the Texas Secretary of State and the New Mexico Secretary of State at all pertinent times. In fact, by November 7, 2019, Aztec Well and Triple S had already served summons and citations in all of the above-mentioned suits upon Copper Ridge by serving its registered agents.
- 33. Despite such knowledge, on November 10, 2019, Aztec Family published ¼-page color "Wanted" pictures of Burkett and another man in the Sunday editions of both the Midland Reporter-Telegram and the Abilene Reporter-News newspapers, identifying both by name. Among other disparaging aspects of the "Wanted" pictures and their accompanying text:

- (a) The statement beneath Burkett's picture that "We are attempting to legally serve these two men in an effort to collect millions in outstanding debt" is false and defamatory. Prior to running the "Wanted" picture, Aztec Family had not sued Burkett in any Court for any debt whatsoever and had made no effort at all to serve Burkett in any suit. Furthermore, Burkett did not owe any money to Aztec Family at any time for any reason.
- (b) The statement "And, they are nowhere to be found" is also false and defamatory, implying that Burkett was seeking evade debt obligations. Prior to running the "Wanted" picture, Aztec Family had made no effort to find Burkett, much less to present him with any claim for debt he allegedly owed to Aztec Family. Burkett has owned a home in Midland, Texas for many years and his address, phone number, e-mail and other contact information has been readily available from a variety of published sources at all pertinent times.
- (c) The "Wanted" picture leaves the clear impression with the reader that Burkett was evading suit and that Aztec Family had been unable to locate or serve him. However, both Aztec Well and Triple S had already served Copper Ridge in the New Mexico Warren Suit, the Texas L. L. Butler 3 Suit and the Triple S Suit, respectively, before the "Wanted" picture was published.
- (d) Overall, the "Wanted" picture strongly suggests that Burkett had personally committed some kind of financial crime that has damaged Aztec Family, that Burkett owed millions of dollars to Aztec Family and that Burkett was on the run from his debts. The text beneath the "Wanted" picture does not mention Copper Ridge or any alleged connection between it and Burkett.

F. <u>Burkett's request for retraction</u>

- 34. By letter dated November 15, 2019, Burkett requested in writing that Aztec Family "retract the false advertisement published in Midland Reporter Telegram and the Abilene Reporter News on 11/10/2019 and post a correction and apology in both papers. Upon doing so, please provide me a copy. Also, please cease and desist any further publication of the false advertisement." Such request was both timely and sufficient.
- 35. Aztec Family did not comply with Burkett's written request and, in fact, has not done so to date. Instead, Aztec Family has ramped up its written and verbal disparagement of Burkett, forwarding the "Wanted" pictures to numerous persons and entities and calling others to further publish its content and other slanderous, derogatory statements about Burkett, despite Aztec Family's awareness of the false content and harmful nature of its "Wanted" pictures and its verbal slanderous statements about Burkett.

G. Consequences of Aztec Family's disparagement of Burkett

36. As direct result of Aztec Family's conduct as alleged herein, Burkett has been subjected to ridicule, embarrassment, defamatory comments by others based on the content of the "Wanted" pictures and their accompanying text, personal and professional hardship, loss of business opportunities and a host of other problems. Both Burkett and his family have suffered embarrassment and have been the subject of derogatory comments based on the "Wanted" pictures and their accompanying text.

IV. CLAIMS FOR RELIEF

COUNT 1 – DEFAMATION

- 37. Burkett realleges all matters as set forth in Paragraphs 1 through 36 hereof as if fully restated.
- 38. Aztec Family and its representatives have published numerous false, defamatory statements concerning Burkett while acting with both negligence and actual malice regarding the truth of such statements. An ordinary person would interpret each of Aztec Family's statements in a way that tends to injure Burkett's reputation and thereby exposes Burkett to public hatred, contempt or ridicule, financial injury or serves to impeach Burkett's honesty, integrity, virtue or reputation. Aztec Family's defamatory conduct directed toward Burkett is both slanderous *per se* and libelous *per se*.
- 39. Aztec Family's conduct as alleged herein has proximately caused and produced actual damages to Burkett as more fully set forth herein, for which Burkett seeks judgment against Aztec Family, Aztec Well, Drilling, Triple S, Total, Double M, Roadrunner and Sandel, individually, jointly and severally.

V. <u>ACTUAL DAMAGES</u>

- 40. As a result of Aztec Family's conduct as alleged herein, Burkett has suffered actual damages as follows:
 - (a) Mental anguish in the past and future;
 - (b) Loss of reputation in the past and future;
 - (c) Loss of business opportunities in the past and future; and
 - (d) Other damages.

41. Each and all of Burkett's actual damages were proximately caused and produced by the conduct of Aztec Family as alleged herein, for which Burkett seeks judgment against Aztec Family, Aztec Well, Drilling, Triple S, Total, Double M, Roadrunner and Sandel, individually, jointly and severally, in the amount of not less than \$5,000,000.00.

VI. EXEMPLARY DAMAGES

- 42. The conduct of Aztec Family as alleged herein was committed willfully, knowingly, intentionally and with malice, wantonly, recklessly, fraudulently and with reckless disregard for Burkett's rights, and is likely to happen again unless deterred.
- 43. To deter future conduct like that described herein, in addition to liability for actual damages, Aztec Family should also be assessed exemplary damages in favor of Burkett in such amount as the jury may find proper, for which Burkett also seeks judgment against Aztec Family.

VII. CONDITIONS PRECEDENT

44. Burkett has fully satisfied and complied with all required notices, demands and conditions precedent to asserting his claims and all rights to relief as stated herein.

VIII. <u>JURY DEMAND</u>

45. Burkett demands a trial by jury.

IX. REQUEST FOR RELIEF

46. For all these reasons, Burkett asks that upon trial, he be granted judgment against Aztec Family, Aztec Well, Drilling, Triple S, Total, Double M, Roadrunner and Sandel, individually, jointly and severally, for actual damages, exemplary damages and other relief sought herein, and that Burkett recover his costs of Court and such other relief, general and special, legal and equitable, to which he may be entitled.

Dated: February 28, 2020.

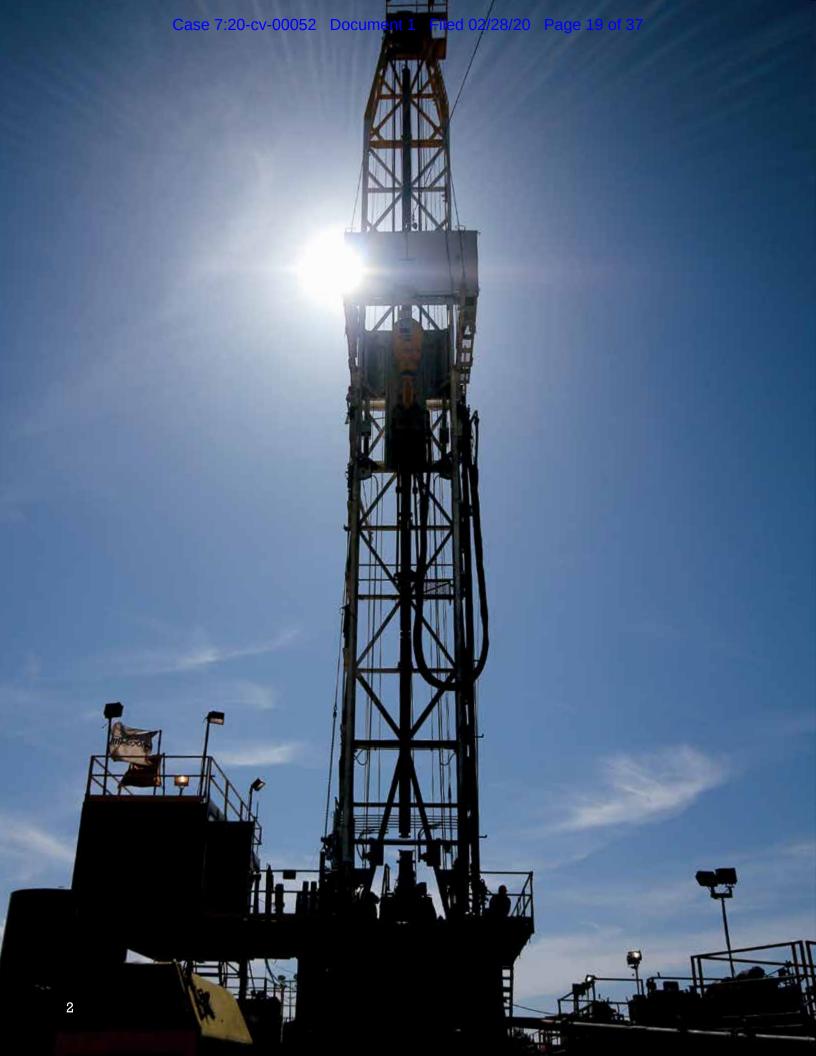
Randy Lee Attorney at Law 705 West Wadley, Suite 210-I Midland, TX 79705 Telephone: (432) 638-0895 Fax: (432) 224-1044 randyleeattorney@gmail.com

/s/ Randy Lee Randy Lee

Texas Bar No. 12074600 Attorney for Mark A. Burkett

EXHIBIT 1





WE PROMISE, AND DELIVER.

The Aztec Well family of companies has been professionally serving our customers with family-owned care and expertise since 1963. With 700+ employees, our core values are built with the priority of **Safety First**. With nearly five decades of experience, we provide you the best of both worlds: the knowledge and resources of a large and long-lived company, combined with the care and timely responses of a family-owned business.

LET US INTRODUCE OURSELVES. WE ARE THE AZTEC WELL FAMILY, HOME OF THE PROFESSIONAL ROUGHNECKS.

COMPLETE OIL AND NATURAL GAS SERVICES.

OIL AND NATURAL GAS DRILLING, WELL SERVICING, TRUCKING, RENTALS AND EQUIPMENT, SUPPLIES, AND SUPPORT SERVICES. We offer each service separately, or as a complete package, to suit your needs. Welcome to our Aztec Well family of companies. We are committed to fulfilling your needs with reliable and professional care for today and the future.













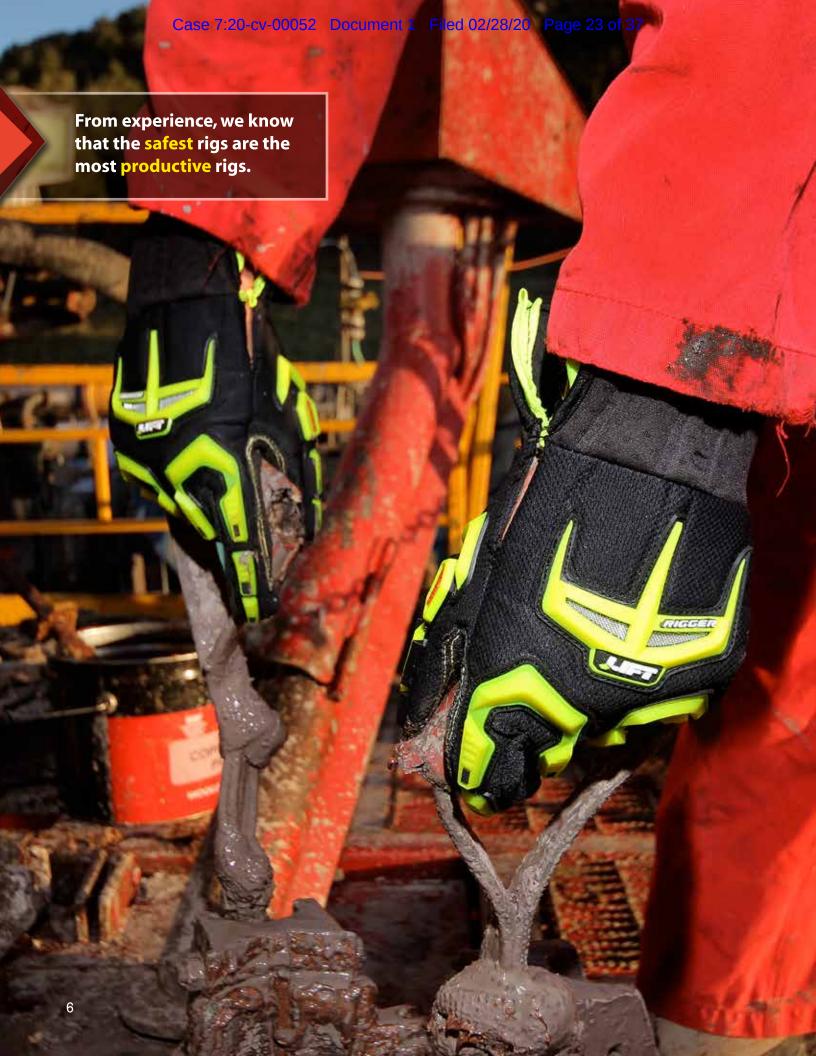












"MY VISION IS THE SAFEST WORKPLACE IN THE INDUSTRY...

...I EXPECT ALL OF US TO MAKE IT A PERFECT DAY."

—Jerry Sandel, President

The Aztec Well family of companies believe strongly in creating a culture of safety, with empowered employees doing it right each day, every day. Our employees receive rigorous training and the best safety equipment. We implement the strictest safety and operational protocols, leading rather than following industry safety standards. Aztec Well Servicing Co. has been the recipient of the NM OSHA, "Safe Site" designation, and the AESC Silver and Gold safety awards. We are also IADC Rig Pass (RP625) certified and SafeLand certified for our *Drilling Contractor In-House Training* program. Our goal is to **safely** and **efficiently** get the job done, while exceeding your expectations.



"Our commitment to our customers is to continue to give big company service with the personal care of a small company."

—Jerry Sandel, President



"Safety is more than an expectation or a requirement—it is the way we conduct our business...it's at the core of everything we do."

—Jason Sandel, Executive Vice President

12 STATES AND COUNTING.

SAN JUAN BASIN — CORPORATE OFFICE AZTEC, NEW MEXICO • 505-334-6194

Aztec Well Servicing • 505-334-6191

Aztec Drilling • 505-334-6191

Triple S Trucking — Equipment Haul Division • 505-334-6196

Triple S Trucking — Fluid Haul Division • 505-334-6193

Totah Rental & Equipment • 505-334-8939

Double M & Filter Service • 505-327-0470

RoadRunner Fuels • 505-333-3990

PERMIAN BASIN - HOBBS, NEW MEXICO • 575-391-0401

Aztec Well Servicing • 575-391-0401

Aztec Drilling • 505-320-9526

Triple S Trucking — Equipment Haul Division • 505-215-9039

APPALACHIA REGION - INDIANA, PENNSYLVANIA • 724-464-5280

Aztec Well Servicing • 724-541-6999

Triple S Trucking — Equipment Hauling • 505-320-0520

Totah Rental & Equipment • 724-349-1818

UINTAH BASIN — VERNAL, UTAH • 505-334-6194

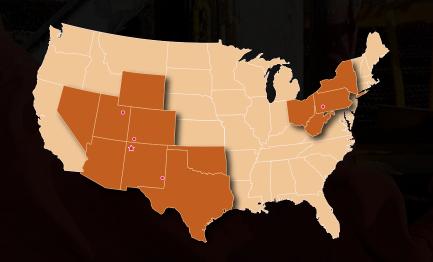
Aztec Drilling • 505-486-0607

Triple S Trucking — Equipment Haul Division • 505-334-6196





www.aztecwell.com







A FAMILY OF **COMPANIES.**

OIL AND NATURAL GAS DRILLING, WELL SERVICING, TRUCKING, RENTALS AND EQUIPMENT, SUPPLIES, AND SUPPORT SERVICES

AZTEC WELL SERVICING CO.

comprises a fleet of professionallymaintained rigs strategically located to provide completions, workovers, and drill-outs to depths of 16,000 feet. Our rig packages include a wide range of services to improve production through the life cycle of any well. We provide the highest quality work coupled with the safest and most experienced crews available to the oil and gas industry — it's what sets us apart from the others.

www.aztecwell.com

AZTEC DRILLING is an oil and natural gas drilling company built on professionalism, customer service, and the ever-so-critical safety and employee training. With nearly 50 years of experience with precision drilling technology, we have the expertise to safely drill in tight places, leaving minimal impacts. Our drilling rigs offer depth ranges from 2,500-16,000 feet, with derrick capacities

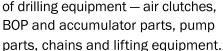
up to 600,000 lbs of static hook load. Rig models include Wilson, Cardwell, Apache, BW Hyduke, and Loadcraft rigs, the majority equipped with hydraulic top-drives.

www.aztecwell.com

TOTAH RENTAL & EQUIPMENT CO. is an oilfield

rental and supply store with complete

rental packages ranging from drill pipe, handling equipment, and power swivels to blowout preventers. Totah Rental provides a wide range of supplies from rope, soap and dope to key rig components. Our vast inventory covers all types



www.totahrental.com















TRIPLE S TRUCKING CO.

Equipment Hauling & Rig Up Division

specializes in transportation, rig up, and



rig down of mobile drilling and service rigs, from 220" wheelbase road trucks up to 400" twin-steer tandems. In addition, we have loaders/forklifts to assist during rig up/rig down and pipe hauling. For

oversize and wide loads we offer certified escorts and pilot vehicles.

www.ssstrucking.com

TRIPLE S TRUCKING CO.

Fluid Division operates over 50 trucks, transporting fluids to and from drilling and completion rigs, as well as transporting produced water from well sites to approved disposal sites.

Our standard services include:

Experienced, safety-minded drivers Invoicing spreadsheets for cradle-tograve reporting of produced water GPS tracking and dispatch system Largest fleet of DOT spec vacuum tanks in the San Juan Basin Largest and newest fleet

www.ssstrucking.com

ROADRUNNER FUELS AND CONVENIENCE STORE

serves the San Juan Basin from Aztec, New Mexico. We provide fuel for the local community as well as our company vehicles. Roadrunner Fuels provides easy, large truck access with satellite fueling, and includes a convenience store, truck stop, RV center, propane, ATM, and a wide variety of hot foods and snacks. We take pride in our clean, neat, and friendly atmosphere, where our staff always greets you with a smile.

www.roadrunnerfuelstores.com

DOUBLE M SALES & FILTER SERVICE CORPORATION has been

supporting the oil and gas industry for over 25 years. Double M is one of the most diverse supply stores in the San Juan Basin. We offer a full line of safety equipment and Miller Fall protection, forged steel fittings, suction and hydraulic hoses up to 5000 PSI, and filtration products.

Largest Donaldson Filtration distributor in the Rocky Mountain region, with a complete line of filters,

exhaust and intake parts Centrifugal pumps and pump parts from National Oilwell Varco (NOV)

GE Osmonics filters for produced water filtration Pipeline pigs and pigging products from Girard Industries

Drilling mud products
Pup joints and API couplings
from Aztec Tubular Products
Single and multi-gas monitors,
and calibration/data
equipment from Honeywell
Online ordering

www.doublemsales.com











SAFETY, HEALTH, ENVIRONMENT.

family of companies, safety is at the core of every operation. We begin in the classroom with our Safety Training Program, certified with IADC RIG PASS (RP625) and SafeLand accreditation for our *Drilling Contractor In-House Training* program. Each employee receives three full days of classroom training. We also offer continuing education programs to make safety not just a exercise, but a lifestyle.

Aztec Well vigorously adopts new safety equipment to protect our workers. Each employee receives impact-resistant gloves—one of our examples of exceeding industry safety standards. We also implement a hard-hat color-coding system, so every worker knows each other's level of experience.

We hold ourselves and our employees to the highest and strictest standards of safety in the industry, continually raising the bar and expectations for a "Perfect Day." Above all, the safety of our workers and the work site is our number-one priority.

HEALTH Wellness and health go beyond the work site. Outstanding health care is our commitment to our employees and their families. At our headquarters in Aztec, New Mexico a full-time nurse practitioner is on staff to address any health issues for employees and families. All workers and their family members have 24/7 access to our exercise and fitness facility, including fun fitness classes. Additionally we offer an Employee Assistance Program for personal or family-related counseling.

ENVIRONMENT

Environmental responsibilities are integral to the way we conduct our business. Through continual improvement and efficient and effective use of our equipment, we aspire to zero incidents and protection of the environment for future generations.











WE DELIVER

No matter your hauling requirements, Triple S Trucking Company is your one stop solution. From the rolling hills of Pennsylvania and desert bluffs of Utah to the plateaus of New Mexico — **Triple S Trucking is close by and ready to exceed your expectations.**



HEAVY HAULING.

Triple S Trucking Equipment Hauling and Rig Up Division offers:

- A large fleet of rig up trucks specializing in the rig up and rig down of mobile drilling and service rigs, with wheelbases from 220" to 400"
- Specialized trailers for all of your equipment hauling needs
- 400 bbl frac tanks
- 500 bbl blow down tanks
- Trash baskets
- Tubing trailers laydown trailers with handrails and stairs
- Certified escorts and pilot vehicles



Locations

Aztec, New Mexico Hobbs, New Mexico Indiana, Pennsylvania Vernal, Utah



A REVOLUTION IN SAFE LIFTING

We are one of the only oilfield equipment hauling companies using Purple Plasma 12 synthetic winch lines. Plasma rope is just one of the many methods Triple S utilizes, leading the industry in safety standards.

FLUD HAULING.

Triple S Trucking Fluid Haul Division offers full service hauling from drilling through production fluids:

- Transporting fluids to and from drilling and completion rigs
- Hauling produced water from well sites to approved disposal sites
- Experienced in all aspects of fluid management
- Water truck capacities of 80, 100, and 110 bbl
- DOT specified vacuum tank trucks
- Combination truck and pup trailer vacuum truck, and 150 bbl tanker transport

Hauling Versatility Our Pennsylvania location is equipped with some of the most versatile trucks in the industry — with a vacuum pump, a hydraulic winch, and a fifth wheel all on one truck. If you need a 130 bbl vacuum tanker truck for water hauling, a winch truck with a trailer to haul equipment or sand/bulk trailers, or a fifth wheel truck to move your 500 bbl mobile frac tanks — one truck does it all.







SAFETY DRIVEN

Safety at Triple S Trucking begins with our prejob analysis, followed by attentive drivers are engaged and, committed to safely and successfully complete the job. Triple S continually raises the bar to make each day a "Perfect Day."



Manufacturer

Corsair



Unit#

266

WORKOVER RIGS.

Series No.

400

Derrick Rating, Ibs.

215,000

Derrick Height

96

| 374 | Cooper | 350 | 205,000 | 96 |
|------|---------------------------|-----|---------|-----|
| 378 | Cooper | 350 | 200,000 | 97 |
| 395 | Cooper | 350 | 210,000 | 97 |
| 442 | Cooper | 350 | 240,000 | 104 |
| 448 | Corsair | 400 | 215,000 | 96 |
| 449 | Corsair | 450 | 215,000 | 96 |
| 450 | Corsair | 400 | 215,000 | 96 |
| 471 | Cooper | 350 | 205,000 | 96 |
| 488 | Corsair | 350 | 215,000 | 96 |
| 506 | Cooper | 350 | 205,000 | 96 |
| 523 | Cooper | 350 | 200,000 | 97 |
| 557 | Corsair | 350 | 205,000 | 96 |
| 580 | BW Hyduke 600 | 525 | 240,000 | 107 |
| 656 | Cooper | 350 | 200,000 | 97 |
| 731 | Load Craft | 525 | 225,000 | 104 |
| 746 | Load Craft | 525 | 225,000 | 104 |
| 748 | Service King | 525 | 250,000 | 104 |
| 753 | Service King | 525 | 250,000 | 104 |
| 812 | Service King | 525 | 250,000 | 104 |
| 825 | Service King | 525 | 250,000 | 104 |
| 840 | Service King | 525 | 250,000 | 104 |
| 880 | Service King | 525 | 250,000 | 104 |
| 941 | Care Industries, Swab Rig | | N/A | 45 |
| 942 | Service King | 525 | 250,000 | 104 |
| 993 | Service King | 525 | 250,000 | 104 |
| 1055 | Load Craft | 525 | 250,000 | 110 |
| 1056 | Load Craft | 525 | 250,000 | 110 |



DRILLING RIGS.



| Rig | Manufacturer And Model | Drawworks (HP) | Derrick Height, ft. | Static Hook Load, Ibs. | Pumps (HP) | Depth Rating, ft. |
|-------|---------------------------|-------------------|------------------------|---------------------------|---------------|----------------------|
| 184 | Wilson 75 | 1,000 | 110 | 354,000 | 900 | 10,000 |
| *222 | Wilson 75 | 1,000 | 110 | 354,000 | 900 | 10,000 |
| *507 | Apache WN 250H-40 | 475 | 64 | 300,000 | 700 | 7,000 |
| 545 | Cardwell KB 700 | 700 | 112 | 300,000 | 800 | 9,000 |
| *673 | Load Craft HRI 700 | 1,000 | 116 | 410,000 | 1000 | 12,000 |
| *711 | Load Craft HRI 700 | 1,000 | 116 | 410,000 | 900 | 10,000 |
| *730 | Load Craft HRI 850 | 1,000 | 116 | 410,000 | 1000 | 12,000 |
| *777 | Load Craft HRI 1000 | 1,000 | 116 | 410,000 | 1000 | 12,000 |
| *781 | Load Craft HRI 700 | 1,000 | 116 | 410,000 | 1000 | 12,000 |
| *920 | Hyduke 460K | 1,000 | 106 | 460,000 | 1300 | 14,000 |
| *950 | Service King SK 1000 | 1,000 | 117 | 410,000 | 1000 | 12,000 |
| *980 | Load Craft LCI-1000T | 1,000 | 118 | 440,000 | 1000 | 14,000 |
| *1000 | Hyduke 600K Triple | 1,500 | 136 | 600,000 | 1600 | 16,000 |
| *1099 | Load Craft LCI-1100 | 1,260 | 118 | 485,000 | 1600 | 14,500 |

^{*} Rigs are top-drive equipped. Rig equipment inventories are subject to change.

See rig inventory details at www.aztecwell.com



